

REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-20 in the application. In a previous present response, the Applicants amended Claims 1, 11-17 and 19-20, canceled Claims 9-10 and 18 without prejudice or disclaimer and added Claims 21-23. In the present response, the Applicants have amended Claims 1, 7-8, 13-14, 17 and 20-23. Support for the amendment can be found in the original specification at paragraphs 20, 25, 28-29 and Figures 1-4. The Applicants have not added or canceled any claims in this response. Accordingly, Claims 1-8, 11-17 and 19-23 are currently pending in the application.

I. Rejection of Claims 1-4, 7-8, 11-13, 17 and 19-20 under 35 U.S.C. §103

The Examiner has rejected Claims 1-4, 7-8, 11-13, 17 and 19-20 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication No. 2004/0095500 by Sato, *et al.*, in view of U.S. Patent Application Publication No. 2002/0048459 by Mishio. The Applicants respectfully disagree with the Examiner's rejection in view of amended independent Claims 1 and 17. More specifically, the cited combination fails to teach or suggest automatically configuring a display of a mobile communication device for a particular application based on a detected position of a camera module relative to a main body of the mobile communication device as recited in amended independent Claims 1 and 17.

As recognized by the Examiner, Sato provides no teaching or suggestion of automatically starting a program stored within a memory of a mobile communication device based on detecting a certain position of a camera module. To cure this deficiency, the Examiner cites Mishio. (*See Examiner's Action, page 2.*)

Mishio addresses the problem of expanded time required for starting a camera of a portable information terminal. (See paragraph 8.) Mishio discloses detecting the turning of a lens of a camera of a portable information terminal and notifying an image control means of the relation between the vertical direction of an image generated by the camera and the vertical direction of the actual image. If needed, the imaging display means processes the image such that the image is inverted on the display means. (See paragraph 31 and Figures 1-2.)

The display means, therefore, is not automatically configured for a particular application based on a detected position of the camera lens. Instead, the image is inverted if needed based on the position of the camera lens to insure the image is presented correctly on the display means. Thus, Mishio discloses using a detected position of the camera lens to insure an image is properly displayed but provides no teaching or suggestion of using a detected position of the camera lens to automatically configure the display means for a particular application. On the contrary, in association with detecting the position of the camera lens, the display means is employed for a single application, presenting the image. As such, the Mishio does not cure the deficiency of Sato.

The cited combination of Sato and Mishio, therefore, does not teach or suggest each element of amended independent Claims 1 and 17. As such, the cited combination fails to provide a *prima facie* case of obviousness of Claims 1 and 17 and Claims dependent thereon. Claims 1-4, 7-8, 11-13, 17 and 19-20, therefore, are not unpatentable in view of the cited combination. The Applicants, therefore, respectfully request the Examiner to withdraw the §103(a) rejection of Claims 1-4, 7-8, 11-13, 17 and 19-20 and allow issuance thereof.

II. Rejection of Claims 14-15 and 21 under 35 U.S.C. §103

The Examiner has rejected Claims 14-15 and 21 under 35 U.S.C. §103(a) as being unpatentable over Sato in view of U.S. Patent No. 6,532,035 to Saari, *et al.* Dependent Claim 21 has been amended and no longer depends on independent Claim 14. Accordingly, dependent Claim 21 will not be addressed regarding independent Claim 14.

Regarding Claim 14, the cited combination does not provide a *prima facie* case of obviousness of independent Claim 14 as amended. More specifically, the Applicants do not find where either Sato or Saari, individually or in combination, teach or suggest a mobile communication device including a camera module having complementary attaching means to a main body of the mobile communication device, such that the camera module is **wholly detachable** as recited in amended Claim 14. This is recognized by the Examiner regarding Sato and evident in Saari based on Figures 1-5. As such, the Applicants respectfully request the Examiner to withdraw the §103 rejection of amended Claim 14 and Claim 15 which depends thereon and allow issuance thereof.

III. Rejection of Claim 16 under 35 U.S.C. §103

The Examiner has rejected Claim 16 under 35 U.S.C. §103(a) as being unpatentable over Sato in view of U.S. Patent Application No. 2004/0041911 by Odagiri. The Applicants respectfully disagree.

The Examiner recognizes that Sato does not teach or suggest an attaching means that allows a camera module to be wholly detachable from a mobile communication device. To cure this deficiency, the Examiner cites Odagiri. (*See Examiner's Action*, page 7.)

Odagiri discloses a digital camera is attachable to a portable information terminal by inserting a plug of the digital camera in the earphone jack of the portable information terminal. (See paragraph 147 and Figure 3.) One skilled in the art, however, would not be motivated to combine the teaching of Odagiri with Sato because the attaching means of Odagiri would not allow the camera of Sato to move from a retracted position to an exposed position. On the contrary, the earphone jack and digital camera plug of Odagiri would simply allow the camera unit of Sato to be externally attached to the mobile telephone terminal without the camera unit being moveable from a retracted position to an exposed position. Thus, the teaching of Odagiri frustrates the teaching of Sato. As such, Odagiri and Sato are improperly combined.

Therefore, Sato and Odagiri do not provide a *prima facie* case of obviousness of independent Claim 16. Accordingly, the Applicants respectfully request the Examiner to withdraw the §103 rejection with respect to Claim 16 and allow issuance thereof.

IV. Rejection of Claims 5-6 under 35 U.S.C. §103

The Examiner has rejected Claims 5-6 under 35 U.S.C. §103(a) as being unpatentable over Sato in view of Mishio and in further view of U.S. Patent Application Publication No. 2003/0174239 by Sawada. As discussed above regarding amended Claim 1, the cited combination of Sato and Mishio does not teach or suggest automatically configuring a display of a mobile communication device for a particular application based on a detected position of a camera module relative to the main body of the mobile communication device.

Sawada has not been cited to cure this deficiency of Sato and Odagiri but to teach a camera module that is rotatable about at least two axes of rotation in an exposed position. (See Examiner's

Action, page 8.) The cited combination of Sawada with Sato and Mishio, therefore, does not provide a *prima facie* case of obviousness of amended independent Claim 1 and Claims dependent thereon. Dependent Claims 5-6, therefore, are not unpatentable in view of the cited combination. The Applicants, therefore, respectfully request the Examiner to withdraw the §103(a) rejection of Claims 5-6 and allow issuance thereof.

V. Rejection of Claim 22 under 35 U.S.C. §103

The Examiner has rejected Claim 22 under 35 U.S.C. §103(a) as being unpatentable over Sato in view of Saari and in further view of U.S. Patent No. 6,785,935 to Ahn, *et al.* Claim 22, however, has been amended to now depend on amended dependent Claim 21. The Applicants therefore respectfully request the Examiner to withdraw the previous rejection of Claim 21 and allow issuance thereof.

VI. Rejection of Claim 23 under 35 U.S.C. §103

The Examiner has rejected Claim 23 under 35 U.S.C. §103(a) as being unpatentable over Sato in view of Mishio and in further view of U.S. Patent Application Publication No. 2004/0242263 by Nishimoto, *et al.* As discussed above regarding amended Claim 1, the cited combination of Sato and Mishio does not teach or suggest automatically configuring a display of a mobile communication device for a particular application based on a detected position of a camera module relative to the main body of the mobile communication device. Nishimoto has not been cited to cure this deficiency of Sato and Mishio but to teach a flash coupled to a camera module. (*See* Examiner's Action, page 8.) The cited combination of Nishimoto with Sato and Mishio, therefore,

does not provide a *prima facie* case of obviousness of amended independent Claim 1 and Claims dependent thereon. Amended dependent Claim 23, therefore, is not unpatentable in view of the cited combination. The Applicants, therefore, respectfully request the Examiner to withdraw the §103(a) rejection of Claim 23 and allow issuance thereof.

VII. Comment on Cited References

The Applicants reserve further review of the references cited but not relied upon if relied upon in the future.


VIII. Conclusion

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-8, 11-17 and 19-23.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

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Dated: September 1, 2006

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